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6 7	Counsel for Defendant ABDI	
8	IN THE UNITED STATES DISTRICT COURT	
9	FOR THE NORTHERN DISTRICT OF CALIFORNIA	
10 11	SAN FRANCISCO DIVISION	
12	UNITED STATES OF AMERICA,	Case No. CR 15-301 WHA
13	Plaintiff,	STIPULATION & [PROPOSED] ORDER TO CONTINUE
14	v.	01.02.010
15	ABDULKARIM HASSAN ABDI,	
16 17	Defendant.	
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US v. Abdi, Case No. 15-301 WHA; STIP & [PROPOSED] ORDER TO CONTINUE

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The parties are jointly requesting that the status conference presently set for Tuesday, September 8, 2015 at 2:00 p.m. be continued to Tuesday, October 6, 2015 at 2:00 p.m.

As defense counsel informed the Court at the last appearance, it has become apparent that the defendant requires the assistance of a Somali language interpreter. Unfortunately, there are no local Somali interpreters, so meetings with counsel must be conducted with an interpreter appearing by phone. At this time, defense counsel and the defendant have not had sufficient time to finish a thorough review of the discovery and consider the government's plea offer. Additionally, defense counsel will be going out on maternity leave shortly, and new counsel will be assigned to the case. As such, the parties believe it will be most efficient for the parties and the Court to have the next appearance when it is clear who new counsel will be in the case.

For the above reasons, the parties stipulate there is good cause – taking into account the public interest in the prompt disposition of this case – to exclude the time from September 8, 2015 to October 6, 2015 from computation under the Speedy Trial Act, and that failing to exclude that time would unreasonably deny the defendant and his counsel the reasonable time necessary for effective preparation of counsel taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties further agree that the ends of justice would be served by excluding the time from September 8, 2015 to October 6, 2015 from computation under the Speedy Trial Act and that the need for the exclusion outweighs the best interests of the public and the defendant in a speedy trial.

IT IS SO STIPULATED.

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)	September 2, 2015 DATED	/s/ LLOYD FARNHAM Assistant United States Attorney
) 	September 2, 2015 DATED	JODI LINKER Assistant Federal Public Defender
;	IT IS SO ORDERED.	1000
,	September 2, 2015. DATED	WILLIAM H. ALSUP United States District Judge

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